

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

RED RIVER TALC LLC,¹

Debtor.

Chapter 11

Case No. 24-90505 (CML)

**AMENDED VERIFIED STATEMENT OF OTTERBOURG P.C.,
BAILEY GLASSER LLP AND LAWSON & MOSHENBERG PLLC
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

On October 9, 2024 counsel for the Coalition of Counsel for Justice for Talc Claimants (the “Coalition”) filed a Verified Statement Pursuant to Federal Rule of Bankruptcy Procedure 2019 (the “Initial Verified Statement”). [Dkt. No. 243] At the time that the Initial Verified Statement was filed, the Coalition was represented by Otterbourg P.C., Brown Rudnick LLP and Stutzman, Bromberg, Esserman & Plifka, PC. The Coalition is currently represented by Otterbourg P.C., Bailey Glasser LLP and Lawson & Moshenberg PLLC (collectively, “Counsel”), who submit this amended verified statement (the “Amended Verified Statement”) on behalf of the Coalition pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

1. This Amended Verified Statement amends the Initial Verified Statement solely to remove the following law firms as members of the Coalition effective as of November 21, 2024:

(1) Ashcraft & Gerel, LLP and (2) Robinson Calcagnie, Inc.²

¹ The last four digits of the Debtor’s federal tax identification number are 8508. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

² On November 21, 2024, Ashcraft & Gerel LLP and Robinson Calcagnie, Inc. each sent an email to Otterbourg P.C., as counsel for the Coalition, to notify counsel that each was resigning from the Coalition effective immediately.

2. Attached hereto as **Exhibit A** is a list of the names and addresses for each law firm that is currently a member of the Coalition and the number of claimants (each a “Client,” and collectively the “Clients”) represented. Counsel has been retained to represent the Coalition and does not represent the individual members of the Coalition or the Clients.

3. Other than the changes noted above, all other aspects of the Initial Verified Statement remain unchanged, including the lists of the clients represented by each of the remaining members of the Coalition, as reflected on Exhibits C through F, which are incorporated herein, and the relevant Client acknowledgements, as reflected on Exhibit H, which are also incorporated herein. Additional parties may become members of the Coalition, and members of the Coalition may cease to be members in the future.

4. The information contained in Exhibit A is based upon information provided by the applicable members of the Coalition or the Clients.

5. The Coalition, through Counsel, reserves the right to further amend and/or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019 at any time in the future.

WHEREFORE, the undersigned verify that the foregoing is true and correct to the best of their knowledge.

Dated: November 22, 2024

Respectfully submitted,

LAWSON & MOSHENBERG PLLC

/s/ Nicholas R. Lawson

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*Co-Counsel for the Coalition of Counsel for Justice
for Talc Claimants*

CERTIFICATE OF SERVICE

I certify that on November 22, 2024, I caused a true and correct copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Nicholas R. Lawson
Nicholas R. Lawson